

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Joanna Tellez	:	Case No.: 17-10489(AMC)
	:	
Debtor(s)	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Joanna Tellez, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about January 1, 2017.
2. The Chapter 13 filing was assigned case number 17-10489(AMC).
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about August 23, 2017.
4. The vehicle need significant engine repair and the Debtor believes that it is in her best financial interest to surrender the 2012 Mercedes-Benz C-Class.
5. Debtor wishes to modify her plan to surrender the vehicle.
6. In furtherance of the Motion, this Motion and the Modified Chapter 13 Plan are being contemporaneously filed.
7. the Debtor's proposed Modified Chapter 13 Plan, attached hereto as **"Exhibit A"**, is affordable by the Debtor.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: June 24, 2020

/s/Brad J. Sadek, Esq
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